

**Steven C. Anderson, CAE**

President and  
Chief Executive Officer

August 4, 1999

USDA/FSIS Hearing Clerk  
300 12<sup>th</sup> Street, SW  
Room 102 Cotton Annex  
Washington DC 20250-3700

RE: USDA Docket No. 98-045N  
FDA Docket No. 97N-0074

Dear Madam or Sir:

The National Restaurant Association appreciates the opportunity to submit its views in this written statement on the *President's Council on Food Safety* public meeting held July 15, 1999, Federal Register, Vol. 64, No. 116, Thursday, June 17, 1999, Notice. As leaders in the hospitality industry, restaurants have had a long-standing commitment to food safety and the protection of our customers and are deeply interested in improving the nation's food supply.

The National Restaurant Association is the leading business authority for the nation's \$354 billion restaurant industry comprised of over 815,000 restaurant locations. Our 37,000 members represent more than 170,000 individual full-service restaurants, quick-service units and cafeterias, institutions, hospitals, universities and military clubs. We have made a multi-million dollar investment in developing education programs and improving restaurant food safety over the past 25 years. In cooperation with state and local health officials, the National Restaurant Association has helped develop state-of-the-art model food safety standards, educational and informational materials based upon current science, and Hazard Analysis Critical Control Points (HACCP) for restaurants.

While we strongly applaud the goals of the Council, we are disappointed with the make-up of this important council because no food industry members were invited to sit at the table. While the public and industry have been invited to briefly speak at meetings, final decisions will be made at the table. Without food industry and consumer members participating as active partners in addressing important food safety issues, government solutions may be severely crippled. Government does not have all the answers to the complex issues of farm-to-table food safety and it would be wise to actively work with the food industry and members of the public to fully address current issues.

We have received data from CDC -- the federal agency charged with development of national foodborne illness data -- that indicate that commonly used foodborne illness estimates to justify

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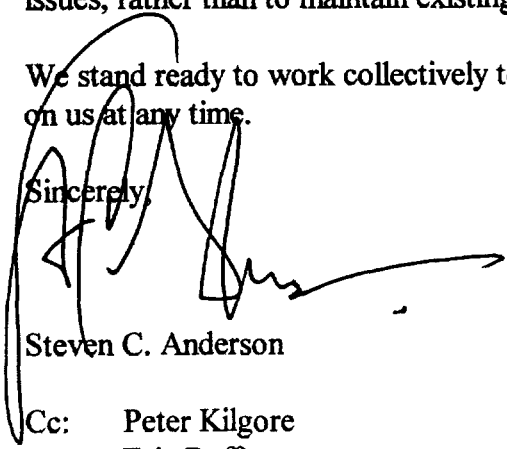
proposed legislation and increased governmental oversight are severely flawed and unreliable. The CDC has released data that indicate that there are far fewer foodborne illnesses in the nation than we were previously led to believe by many in government. It is becoming quite clear that we currently have no reliable data to evaluate the effectiveness of current or future proposed federal programs in food safety. We strongly believe that the first step this Council needs to make in addressing food safety should be to define the food safety problem with accurate numbers. Resources must be provided to obtain reliable foodborne illness data so that we can clearly identify the right problem before we develop industry and government strategies to address it.

Secondly, we believe that any long-term improvement in food safety must be science-based and coordinated between federal agencies involved in food regulation. The current federal system of food safety regulation remains disjointed, inconsistent and in need of a clear food safety focus. We are not convinced that the current needs warrant creation of a single food safety agency. However, what is needed is a clear commitment by this Council and the federal agencies represented that they will truly work together to address food safety in a consistent and science-based manner. For example, USDA continues to waste valuable food safety resources on turn of the century visual meat and poultry inspections, while the FDA is unable to conduct needed import food inspections. The maximum benefit and greatest assurance of safety will be gained by coordinated federal efforts. This requires consistent and direct funding to address the greatest identifiable illnesses, which pose risk to consumers.

Finally, much of the authority to make needed improvements in the federal food safety system already exists. The federal agencies must be focused on addressing food safety problems and not on expanding the individual agency's programs of funding. Adequate food safety funding exists and it must be applied effectively across federal agencies to address documented food safety issues, rather than to maintain existing programs of questionable benefit.

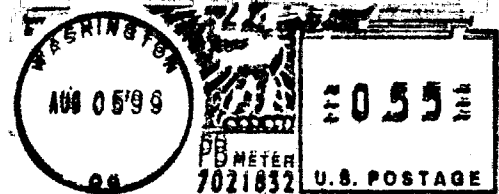
We stand ready to work collectively to improve the nation's food supply. Please feel free to call on us at any time.

Sincerely,



Steven C. Anderson

Cc: Peter Kilgore  
Eric Ruff  
Ellen Moore  
Steve Grover



*Representing, Educating and Promoting the Restaurant/Hospitality Industry*

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